BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendments to Part 90 of the	)	**WT Docket No. 97-153**
Commission's Rules Concerning	)	**RM-8584**
Private Land Mobile Radio Services	)	**RM-8623**
	)	**RM-8680**
	)	**RM-8734**

To: The Commission

COMMENTS OF THE INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION AND THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.

The International Municipal Signal Association ("IMSA") and the International Association of Fire Chiefs, Inc. ("IAFC"), by their attorneys, respectfully submit these Comments in response to the Notice of Proposed Rule Making ("Notice") released by the Federal Communications Commission ("Commission") in the above-captioned matter on August 25, 1997. For the reasons set forth below, IMSA and IAFC strongly support the Commission's proposal to allow the transmission of safety alerting and traffic light control signals on various channels in the 24 GHz band.

I. INTRODUCTION

IMSA is a non-profit organization dedicated to the development and use of electrical signaling and communications systems in the furtherance of public safety.

IMSA members include representatives of federal, state, county, city, township and borough governmental bodies, and representatives of governmental bodies from foreign nations. Organized in 1896, IMSA is the oldest organization in the world dedicated to the activities pertaining to electrical engineering, including the Public Safety use of radio technology.

IAFC is a voluntary, professional membership society. Its membership, comprised of approximately 10,000 senior Fire Service officials, is dedicated to the protection of life and property throughout the United States and abroad. IAFC is the major national professional association representing the interests of senior management in the Fire Service. The Fire Service is the largest provider of emergency response medical service in the United States.

IMSA and IAFC are recognized as the frequency coordinating committee for the Fire Radio Service and the Emergency Medical Radio Service ("EMRS") and, in conjunction with the Personal Communications Industry Association ("PCIA"), constitute the recognized coordinating committee for the Special Emergency Radio Service ("SERS"). Additionally, members of IMSA and IAFC participated in all Subcommittees of the Public Safety Wireless Advisory Committee ("PSWAC"), the predecessor organization to the National Public Safety Telecommunications Council ("NPSTC"), and IMSA/IAFC are charter members of NPSTC. As such, IMSA/IAFC are familiar with the options and issues facing the Commission as it develops regulations and policy to meet

the present and future wireless communications requirements of the public safety community.

II. COMMENTS

In its Notice, the Commission proposed to amend its rules to permit licensees in the Public Safety and Special Emergency Radio Services to use -- on a secondary basis and without additional authorization from the Commission -- the Radiolocation Service frequency 24.10 GHz to transmit safety alerting signals to be received by motorists' radar detectors (the "Radar Traffic Safety Warning System"). The Commission also proposed to permit these licensees to use Radiolocation Service frequencies in the 24.20-24.25 GHz band for use in emergency vehicles for traffic signal control purposes (again on a secondary basis and without additional authorization from the Commission). Specifically, these frequencies could be used to control traffic lights in order to facilitate a "clear route" for a vehicle on an emergency run or to activate a visual or audible warning device located on a traffic signal to warn motorists of the presence of an emergency vehicle in the vicinity of the traffic signal.

IMSA and IAFC urge the Commission to move forward as soon as possible with both of the foregoing proposed rule changes concerning the 24 GHz band. As the Commission explained, transmitters operating on the frequency 24.10 GHz could be installed by local government authorities near potentially hazardous areas, as well as on emergency vehicles such as ambulances and fire engines, and used to send a signal that

would activate a motorist's radar detector and alert the motorist to specific hazardous driving conditions and/or the nearby presence of an emergency vehicle. IMSA and IAFC agree with the Commission that such a Warning System would benefit the public by increasing safety for both motorists and the drivers of emergency vehicles and would provide Public Safety licensees with increased flexibility in the development of communications systems that satisfy their particular requirements. IMSA/IAFC further believe that the frequency 24.10 GHz is well-suited to the type of short-range communications contemplated here and that interference with the Government Radiolocation Service is unlikely in light of the anticipated intermittent and localized use of this frequency by public safety licensees.

IMSA and IAFC also enthusiastically support the Commission's proposal regarding the use of the 24.05-24.25 GHz band for traffic signal control purposes. Many governmental agencies represented by IMSA and IAFC's membership have been in the process of or are interested in developing and implementing communications systems that use directional controls to create a clear route through traffic for emergency vehicles (known as "traffic signal pre-emption"). In particular, such systems can be used to change the traffic light at an intersection to a red signal for traffic flowing in every direction except that of an approaching emergency vehicle. This, in turn, enhances the ability of emergency vehicles to reach their destinations both safely and quickly, while reducing the risk to motorists of accidents involving emergency vehicles.

Although some traffic signal pre-emption systems already have been deployed in other frequency bands and via other modes (e.g., through the use of optical emitters or audible detectors), IMSA/IAFC believe that the availability of 24 GHz spectrum for this purpose would encourage the development of new systems and technologies that likely would be more cost-effective and/or technologically feasible. For instance, the propagation characteristics of the 24 GHz band should be better suited to short-range traffic signal pre-emption transmissions than the low power UHF splinter frequencies which some public safety entities have implemented for this purpose. Further, and as noted above with regard to the proposed Warning System at 24.10 GHz, there does not appear to be a significant risk of interference with the Government Radiolocation Service. Moreover, the ability of public safety entities to implement 24 GHz systems without obtaining authorization from the Commission would decrease the administrative burdens associated with system deployment, while providing increased flexibility in terms of the location and timing of operations and the selection of equipment. In short, all relevant factors argue in favor of the proposed amendments to the Commission's rules.

III. CONCLUSION

Through the use of emerging communications technologies, state and local governments significantly can enhance their ability to protect life and property in times of emergencies or, in some cases, to ward off a crisis situation before it develops. In order to fulfill its duty to make spectrum allocation decisions in the public interest, the Commission must strive to create an environment which fosters the ongoing development

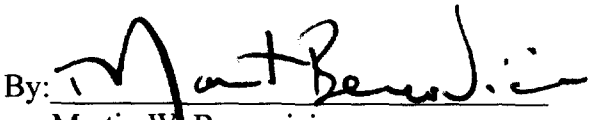
of new systems and technologies that will provide much-needed assistance to public safety entities in the performance of their critical mission. Toward this end, IMSA/IAFC applaud the Commission's proposals regarding the use of 24 GHz channels for safety alerting and traffic signal control transmissions and strongly encourage the Commission to implement these measures without delay.

WHEREFORE, THE PREMISES CONSIDERED, the International Municipal Signal Association and the International Association of Fire Chiefs, Inc. respectfully urge the Federal Communications Commission to act in a manner fully consistent with the views expressed herein.

Respectfully submitted,

INTERNATIONAL MUNICIPAL SIGNAL ASSOCIATION

INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, INC.

By: 

Martin W. Bercovici
Nicole B. Donath
KELLER AND HECKMAN LLP
1001 G Street, NW
Suite 500 West
Washington, DC 20001
(202) 434-4144

Their Attorneys

October 3, 1997